



The parties have collectively retained eight expert witnesses.<sup>1</sup> Plaintiffs' expert witnesses will all be made available for depositions in New York City.<sup>2</sup> Defendants' expert witnesses will be made available in Phoenix, Chicago, New York, and Washington, D.C. None of the experts have been deposed yet and the dispositive motion deadline is currently January 24, 2025. Given the recent holidays, the number of experts to be deposed, and the travel involved, the parties request resetting the expert deposition deadline to February 14, 2025 and moving the dispositive motion deadline to February 28, 2025. The requested extension would allow the parties sufficient time to complete the expert depositions and adequately prepare motions for summary judgment. The parties have diligently addressed the scheduling issues through emails and are in agreement that the proposed extension is necessary.

## **II. Request For Trial Date Conference**

The parties recognize that extending the dispositive motion deadline may impact the May 5, 2025 trial date. The parties therefore respectfully request a conference with this Court to discuss any adjustment to the trial and pre-trial schedule.

## **III. Conclusion**

For the above reasons, the parties respectfully request that the Court grant this motion to reset the expert deposition deadline to February 14, 2025, to extend the dispositive motion deadline to February 28, 2025, and to schedule a conference with the Parties to discuss the trial date.

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<sup>1</sup> Plaintiffs and Defendants have each retained four expert witnesses.

<sup>2</sup> Plaintiffs' expert witnesses are traveling from various locations across the country, including Baltimore, Houston, and Rochester to reduce travel and streamline the expert deposition process.

Respectfully submitted.

DATE: January 8, 2025

/s/ Joshua B. Durham

Ward Davis (NC Bar ID 27546)  
Joshua B. Durham (NC Bar ID 25414)  
BELL, DAVIS & PITT  
227 W. Trade St., Suite 1800  
Charlotte, NC 28202  
(704) 227-0400  
ward.davis@belldavispitt.com  
jdurham@belldavispitt.com

Edgar H. Haug  
Robert E. Colletti  
Mark Basanta  
HAUG PARTNERS LLP  
745 Fifth Avenue  
New York, NY 10151  
(212) 588-0800  
ehaug@haugpartners.com  
rcolletti@haugpartners.com  
mbasanta@haugpartners.com

Attorneys for Plaintiffs  
CMT USA, Inc. and CMT Utensili S.p.A.

/s/ Aaron D. Johnson

Jason M. Sneed (NC Bar ID 29593)  
Megan E. Sneed (NC Bar ID 38525)  
SNEEDPLLC  
445 S. Main St., Suite 400  
Davidson, NC 28036  
(844) 763-3347  
JSneed@SneedLegal.com  
MSneed@SneedLegal.com

Aaron D. Johnson  
David A. Jackson  
Michael J. McCue  
LEWIS ROCA ROTHGERBER CHRISTIE  
LLP  
100 Pine St., Ste. 1750  
San Francisco, CA 94111  
(650) 687-8426  
ADJohnson@lewisroca.com  
DJackson@lewisroca.com  
MMcCue@lewisroca.com

Attorneys for Defendants  
Apex Tool Group LLC and Apex Brands, Inc.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been electronically filed with the Clerk of the Court on January 8, 2025 using the CM/ECF system which does send notification of such filing to all counsel of record.

/s/ Joshua B. Durham

Ward Davis (NC Bar ID 27546)  
Joshua B. Durham (NC Bar ID 25414)  
BELL, DAVIS & PITT  
227 W. Trade St., Suite 1800  
Charlotte, NC 28202  
(704) 227-0400  
ward.davis@belldavispitt.com  
jdurham@belldavispitt.co